



CRUMILLER P.C.

December 27, 2024

VIA ECF

Honorable Brian M. Cogan
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

RE: *Kahlon v. County of Nassau, et al.*, Case No. 24-CV-02439

Dear Judge Cogan,

This firm represents Defendant/Counterclaim-Plaintiff Céline Boulben in regards to her assault and battery and emotional distress counterclaims against Yossef Kahlon in the above referenced matter. In light of the Court's decision to deny the Motion for Extension of Time to File Proposed Joint Pretrial Order (Dkt. No 28), Boulben respectfully requests an emergency adjournment of the deadline for filing the proposed joint pretrial order ("JPO") until January 3, 2025. This is the second request to extend this deadline.

I request this emergency extension because I am currently pregnant with a high-risk pregnancy and will be unable to meet the Court's deadline of December 30th without enduring undue stress, which would be medically dangerous for me. In addition to the tight and unexpected deadline, I also have a scheduled doctor's appointment Monday, which will cut into the time we need to work on the proposed JPO. Kahlon and Nassau County have been informed of my medical concerns and have no objection to this request.¹

Given the current circumstances, we ask that the Court extend the deadline for filing the proposed JPO by four days from December 30, 2024, to January 3, 2025.

Respectfully Submitted,

Julia Elmaleh-Sachs

encl.

cc: Ingrid Fernandez
Kevin T. Kearon
Alexander Klein
Ralph Reissman

¹ I had not previously disclosed my pregnancy to all counsel given that I have only just entered the second trimester, but I feel I have no choice but to do so at this juncture.